



Agribusiness Association of Iowa

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September 7, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U. S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Comments on the Draft Action Plan for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico.

The Agribusiness Association of Iowa requests that you consider the following comments regarding the hypoxia action plan.

The Agribusiness Association of Iowa (AAI) is a state trade association representing the owners, managers, and employees of the retail farm supply and marketing businesses in the state of Iowa. AAI members also include the distributors, manufacturers, and wholesalers of fertilizers, crop protection chemicals and equipment necessary to keep Iowa agriculture efficient and profitable. AAI is a recognized leader in establishing and promoting judicious use, safe handling, and contained storage of commercial fertilizer and crop protection chemicals.

The members of the Agribusiness Association of Iowa wish to express great concern regarding the current draft of the Hypoxia Action Plan. The plan, as presented, is based on the theory that the major factor contributing to the hypoxic zone in the Gulf of Mexico relates to the farming practices in the upper Mississippi River watershed. By discounting all other theories, the plan points an accusatory finger at nitrogen use as the only or the major factor in the formation of an hypoxic zone in the northern gulf. In our opinion, this rush for the simple explanation flies in the face of sound scientific examination and peer reviewed research. The most recent analysis of the hypoxic zone revealed the size to be one fifth the size of the 1999 analysis. Upper Mississippi nitrogen use in 1999 and for the 2000 crop is approximately the same. AAI members are rightly leery of an hypoxia mitigation strategy that would put controls on nitrogen inputs when this data would indicate there is no correlation between nitrogen use and the size of the hypoxic zone in the gulf. The Draft Action Plan offers one solution that would cut by 40% the applications of nitrogen in the upper Mississippi river watershed.

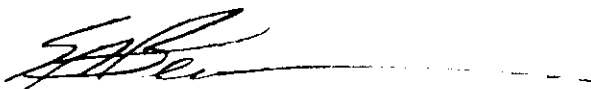
AAI would offer that this is an over simplified solution to a very complex problem. This association would ask for very careful consideration of any strategy that cuts one important nutritive input for little if any corresponding change to hypoxic areas downstream.

The Agribusiness Association of Iowa has been instrumental in promoting the use of voluntary criteria for the application of anhydrous ammonia following crop harvest. This bold step fits with the AAI stated mission of helping to preserve a profitable and environmentally sensitive agriculture. AAI is directly involved in demonstration projects that will result in a better understanding of the fate of applied crop nutrients. Our members, many who are certified by the American Society of Agronomy as Certified Crop Advisers, work daily to promote efficient use of all available crop nutrient sources. AAI continues to serve on nutrient management task forces and committees in this state to offer our membership's experience and counsel when asked. The Agribusiness Association of Iowa would ask the USEPA to consider our members' expertise and our unique relationship with Iowa producers when establishing any crop nutrient regulations or guidelines.

The Agribusiness Association of Iowa will actively support and promote crop nutrient management strategies that are science based and cost effective for the Iowa producer. We will continue to work towards the goal of the most efficient use of all crop nutrient sources with the lowest environmental impact in Iowa and downstream. AAI will provide an active educational program aimed at increasing the professionalism of our agronomy personnel.

Please contact this association if you wish to discuss these comments at greater length. Thank you for this opportunity.

Yours truly,

A handwritten signature in black ink, appearing to read 'Ed A. Beaman', followed by a horizontal line.

Ed A. Beaman
President and CEO

cc Patty Judge, Secretary Iowa Department of Agriculture and Land Stewardship
 Lyle Asell, Director Iowa Department of Natural Resources